

June 12, 2025

VIA ECF

Honorable Taryn A. Merkl
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: *Bartlett, et al. v. Société Générale de Banque au Liban S.A.L., et al.*,
Case No. 19-cv-007 (CBA) (TAM)**

Dear Judge Merkl:

We write on behalf of Moving Defendants¹ to provide a status report to the Court, pursuant to this Court's minute order dated November 18, 2024. Moving Defendants have provided a comprehensive report to Plaintiffs today regarding the scope of customer waivers that Moving Defendants have obtained (the "Report"). The Report discusses Moving Defendants' processes for seeking waivers and information about the discovery materials that have been and soon will be produced pursuant to those waivers.

The Report also provides, on a bank-by-bank basis, additional information breaking down the number of waivers obtained, the names of alleged customers who provided waivers, the percentage of waivers obtained to date, and for certain banks, the number of persons or entities alleged by Plaintiffs to have held accounts with a given bank who did not in fact have accounts during the relevant period.

In addition, the parties are scheduled to meet and confer in the coming days regarding discovery topics including the waiver report, Moving Defendants' proposal regarding Plaintiff Profile Forms, and unresolved issues that Moving Defendants have raised regarding Plaintiffs' productions.

Respectfully submitted,

DECHERT LLP

By: /s/ Jonathan R. Streeter
Jonathan R. Streeter
Tamer Mallat
Julia L. Shea
Dechert LLP
1095 Avenue of the Americas

MAYER BROWN LLP

By: /s/ Mark G. Hanchet
Mark G. Hanchet
Robert W. Hamburg
Benjamin D. Bright
Whitney A. Suflas
Mayer Brown LLP

¹ Société Générale de Banque au Liban S.A.L.; Fransabank S.A.L.; MEAB Bank s.a.l.; Bank S.A.L.; Byblos Bank S.A.L.; Bank Audi S.A.L.; Bank of Beirut S.A.L.; LGB Bank s.a.l.; Banque Libano Française S.A.L.; Bank of Beirut and the Arab Countries S.A.L.; and Fenicia Bank S.A.L.

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Three Bryant Park
New York, NY 10036
212-698-3500
Email: jonathan.streeter@dechert.com
Email: tamer.mallat@dechert.com
Email: julia.shea@dechert.com

Michael H. McGinley
Dechert LLP
Cira Centre
2929 Arch Street
Philadelphia, PA 19104
215-994-4000
Email: michael.mcginley@dechert.com

*Attorneys for Defendants BLOM Bank SAL,
Fransabank SAL, and Bank Audi SAL*

DLA PIPER LLP (US)

By: /s/ Anthony P. Coles
Anthony P. Coles
Erin Collins
DLA Piper LLP (US)
1251 Avenue of The Americas
New York, NY 10020
212-335-4925
Email: anthony.coles@dlapiper.com
Email: erin.collins@dlapiper.com

Samantha L. Chaifetz
500 8th Street, NW
Washington, DC 20004
202-799-4082
Email: samantha.chaifetz@dlapiper.com

*Attorneys for Defendants Byblos Bank SAL,
Bank of Beirut and the Arab Countries SAL,
and Bank of Beirut s.a.l.*

ASHCROFT LAW FIRM, LLC

By: /s/ Michael J. Sullivan
Michael J. Sullivan

1221 Avenue of the Americas
New York, NY 10020
212-506-2500
Email: mhanchet@mayerbrown.com
Email: rhamburg@mayerbrown.com
Email: bbright@mayerbrown.com
Email: wsuflas@mayerbrown.com

*Attorneys for Defendant Banque-Libano
Française SAL*

SQUIRE PATTON BOGGS (US) LLP

By: /s/ Gassan A. Baloul
Gassan A. Baloul
Mitchell R. Berger
Squire Patton Boggs (US) LLP
2550 M Street, NW
Washington, DC 20037
202-457-6155
Email: gassan.baloul@squirepb.com
Email: mitchell.berger@squirepb.com

*Attorneys for Defendants MEAB Bank
s.a.l., Fenicia Bank S.A.L., and LGB Bank
s.a.l.*

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Brian J. Leske

Ashcroft Law Firm, LLC

200 State Street, 7th Floor

Boston, MA 02109

617-573-9400

Email: msullivan@ashcroftlawfirm.com

Email: bleske@ashcroftlawfirm.com

*Attorneys for Defendant Société Générale
de Banque au Liban S.A.L.*